

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STINGRAY IP SOLUTIONS, LLC,

Plaintiff,

v.

SIGNIFY N.V.,
SIGNIFY (CHINA) INVESTMENT CO.,
LTD.,
SIGNIFY HONG KONG LIMITED,
SIGNIFY NETHERLANDS B.V., and
SIGNIFY POLAND SP. Z.O.O.,

Defendants.

Civil Action No. 2:21-cv-00043-JRG
(consolidated)

Civil Action No. 2:21-cv-00044-JRG
(lead)

JOINT MOTION TO CONTINUE STAY OF ALL DEADLINES

Plaintiff Stingray IP Solutions, LLC and Defendants Signify N.V., Signify (China) Investment Co., Ltd., Signify Hong Kong Limited, Signify Netherlands B.V., and Signify Poland Sp. z.o.o. (“Defendants”) (collectively, the “Parties”) respectfully submit this Joint Motion to Continue Stay of All Deadlines. The Parties have now finalized and executed a completed settlement agreement but its finalization was delayed by the intervening holidays, such that additional time is necessary for any required payment to be completed before dismissal papers are filed. In view of these facts, the Parties respectfully request the Court further stay the case for an additional fifteen (15) days, during which period they will file appropriate dismissal papers.

Dated: January 7, 2022

Respectfully submitted,

/s/ Brady Cox

Michael J. Newton (TX Bar No. 24003844)

Brady Cox (TX Bar No. 24074084)

Adam Ahnhut (TX Bar No. 24106983)

ALSTON & BIRD LLP

Chase Tower

2200 Ross Avenue, Suite 2300

Dallas, Texas 75201

Telephone: 214.922.3443

Facsimile: 214.922.3843

Email: mike.newton@alston.com

Email: brady.cox@alston.com

Email: adam.ahnhut@alston.com

Adam D. Swain (DC Bar No. 492063)

ALSTON & BIRD LLP

950 F Street NW

Washington, DC 20004

Telephone: 202.239.3300

Facsimile: 202.239.3333

Email: adam.swain@alston.com

Lauren N. Griffin (NC Bar No. 54766)

ALSTON & BIRD LLP

One South at The Plaza

101 S Tryon St, Suite 4000

Charlotte, NC 28280

Telephone: 704.444.1059

Facsimile: 704.444.1111

Email: lauren.griffin@alston.com

Attorneys for Signify Defendants

/s/ Terry Saad (by permission)

Jeffrey R. Bragalone (lead attorney)

Texas Bar No. 02855775

Terry A. Saad

Texas Bar No. 24066015

Marcus Benavides

Texas Bar No. 24035574

Hunter S. Palmer

Texas Bar No. 24080748

BRAGALONE OLEJKO SAAD PC

2200 Ross Avenue, Suite 4600W

Dallas, Texas 75201

Telephone: 214.785.6670

Fax: 214.785.6680

jbragalone@bosfirm.com

tsaad@bosfirm.com

mbenavides@bosfirm.com

hpalmer@bosfirm.com

Wesley Hill

Texas Bar No. 24032294

WARD, SMITH, & HILL, PLLC

P.O. Box 1231

Longview, Texas 75606

Telephone: 903.757.6400

Fax: 903.757.2323

wh@wsfirm.com

*Attorneys for Stingray IP Solutions,
LLC*

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), I confirm that I have complied with the meet and confer requirement of Local Rule CV-7(h) and confirmed with Terry Saad, counsel for Plaintiff, via email on January 7, 2022 that Plaintiff joins in and does not oppose the relief requested in this motion.

/s/ Brady Cox
Brady Cox

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 7th day of January, 2022.

/s/ Brady Cox
Brady Cox